

AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. Appln. No.: 09/828,467

REMARKS

This Amendment, submitted in response to the Office Action dated November 30, 2004, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Turning to the merits of the Office Action, claims 1-10 remain pending in the application and have been rejected under 35 U.S.C. § 102 as being anticipated by Arledge (U.S.P. 6,535,294). Applicant proposes the following comments for traversing the prior art rejection.

Applicant's invention relates to a system that allows cooperation between multiple entities in creating a document. Referring to Fig. 1, platemaking company 25, printing company 24, advertisement company 23, publishing company 22, print purchaser 21 and printing company 20 are connected to a server site 10. The printing company 20 receives printing orders from the publishing company 22, for example. The printing company designates companies to cooperate with the production of a print job. Such a company which executes a particular part of the job comprises the client, and the printing company which is able to designate the client comprises the customer. With the designations among the entities 21-25 provided on a per job basis to execute a print job, control of access to the job information and cooperation between the entities becomes possible. Fig. 5 illustrates an exemplary embodiment of the apparatus located at server site 10 to coordinate definition of different jobs, and access among different clients and

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customers on a job basis. The site includes a job management server 140 for defining jobs. The job management server further includes a security management server 147 to control access by company and operator. Workspace server 150 stores the data to be processed on a customer and job basis. Asset content server includes a file of previously created documents linked by a keyword element 162 to permit searching. The basic arrangement allows reception of a job, input of a client executing the job and associated customer.

Turning to the cited art, Arledge relates to a web-based print order reception and delivery service. A local client 101 communicates with a retail web server 120 and a wholesale server 140. The wholesale server 140 includes a back-end portion (Fig. 2, 200) which prepares information for printing business cards, labels, etc. based on information provided by the client 101. The wholesale server further provides the printed products. The wholesale server includes an information database 220 associated with a retailer (120) account. In operation, the client is able to communicate directly with the wholesaler 140, which remains anonymous to the client (via back-end), in the preparation of custom print products. The retailer 120, which receives the initial request from the client, is not involved with the preparation of the prints, but the arrangement presents the appearance that the end-user is dealing with the retailer in requesting the printed products. See Col. 4, lines 51-64.

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The Examiner contends that Arledge teaches each feature of claim 1. Applicant propose arguing that the rejection is not supported for at least the following two reasons.

First, claim 1 describes a definition reception section which receives a definition of a job... to produce printing material, the job including input on information of a client executing the job together with a predetermined customer from a terminal of the predetermined customer. The Examiner cites col. 3, lines 40-54 and col. 19, lines 1-13 to teach these features. However, the cited portions describe information provided for the requesting user to set up or access an account and association with the retailer through which the end user has ordered print products. However, the client of claim 1 pertains to the client executing the job. Neither the end user or the retailer of Arledge executes, or performs, the print job. In fact, neither the retailer nor the end user in Arledge have the ability to execute the job. Therefore, even assuming *arguendo* that information is provided to the wholesale web server to obtain printed data, the information is not related to a client executing the job as claimed.

Second, claim 1 describes that the definition reception section receives the information from a terminal of a predetermined customer. The Examiner cites col. 9, lines 59-67 and Fig. 1, elements 101 to teach this aspect. However, col. 9 describes end user information such as name, address telephone number and the identification of a retailer from whose website the end-user gained access to the preparation system. Fig. 1, element 101 corresponds to the client outside of

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the retailer web server 120. Therefore, even though the retailer website may include a hyper text link to the wholesale server, the information is not sent to the wholesale server from a terminal of the retailer. Rather, the information is sent from the client element. Therefore, claim 1 is patentable for at least the reasons set forth above. Claims 2-7 are patentable based on their dependency.

Because claims 8-10 include features similar to that discussed above for claim 1, claims 8-10 are patentable for the reasons set forth above for claim 1.

With further regard to claim 2, this claim describes an upload count section counting a number of times that an image is uploaded. The Examiner cites cols. 3-4 for teaching this feature. However, the cited portion relates to preparation of the printing documents, including the ability to upload information from the client. However, there is no suggestion that there is an upload counting section to count the number of uploads. Therefore, claim 2 is patentable for this additional reason.

With further regard to claim 4, this claim describes a privilege system designated for a client by a customer. The Examiner cites col. 13 to teach this feature. However, the cited portion merely describes how a user may access a previously created data base by entry of certain identification and password information. None of this bears any relation to designation of client privilege by a customer. The customer (retailer) of Arledge does not provide any

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designations for the client, but merely passes the client along to the wholesaler website.

Therefore, claim 4 is patentable for this additional reason. Claim 5 is patentable for analogous reasons.

Applicant propose adding claims 11-15 to describe features of the invention more particularly.

In view of the above, Applicant submits that claims 1-15 are in condition for allowance. Therefore it is respectfully requested that the subject application be passed to issue at the earliest possible time. The Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary..

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

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WASHINGTON OFFICE
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